

TELEGRAM CHART

Document	ECF No.	Category	Request	SEC Position on Telegram's Proposed Redactions ¹
Category A - Redactions to Third Party Investor Names and Personal Information				
PX 1*	81-1	A	Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties filed in connection with this document to determine appropriate redactions.	Dkt. 169-3 Agree
Exhibits A-G to PX 1	N/A	A	These documents have not been filed on the public docket. Defendants request these documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-10 Object; As set forth in more detail in SEC's response to Investor A's motion to redact certain information in these documents, SEC agrees to redaction of investor identifying information only; see Investor Chart under Investor A
PX 2*	81-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-4 Agree
Exhibits A-D and F-I to PX 2	N/A	A	These documents have not been filed on the public docket. Defendants request these documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-11 Object; As set forth in more detail in SEC's response to Investor B's motion to redact certain information in these documents, SEC agrees to redaction of investor identifying information only; see Investor Chart under Investor B
PX 3*	81-3	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-5 Agree

¹ Agreed means that the SEC agrees with the redactions Telegram has proposed in the referenced docket entry.

Document	ECF No.	Category	Request	SEC Position on Telegram's Proposed Redactions ¹
Exhibits A-E to PX 3	N/A	A	These documents have not been filed on the public docket. Defendants request these documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-12 Object; Telegram missed certain redactions of personal information at Ex. C
PX 4*	81-4	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-6 Agreed
Exhibits A-E to PX 4	N/A	A	These documents have not been filed on the public docket. Defendants request these documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-13 SEC agrees with Telegram's proposed redactions to Exhibits B, D and E to PX4; Telegram under-redacted personal identifying information in Exhibits A and C
PX 5*	81-5	A	Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties filed in connection with this document to determine appropriate redactions.	Dkt. 169-7 Agree SEC also agreed with Investor E to redact additional personal identifying information in PX5, which the SEC will file. But <i>see</i> SEC's objections to Investor E additional proposed redaction at Dkt. 160-2, Ex. 1-B in Investor Chart
PX 6*	81-6	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-8 Agree
PX 7*	81-7	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-9 Agree
PX 8*	81-8	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-10 Agree; Same as Dkt. 138, PX8

PX 12*	81-12	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-11 Agree
PX 14*	81-14	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-12 Agree
PX 15*	81-15	A	Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties filed in connection with this document to determine appropriate redactions.	Dkt. 171 -7. Agree except Telegram under-redacted personal identifying information
PX 16*	81-16	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-13 Agree
PX 17*	81-17	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-14 Agree
PX 19*	81-19	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-15 Agree
PX 20*	81-20	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-16 Agree
PX 21*	81-21	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-17 Agree
PX 22*	81-22	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-18 Agree
PX 23*	81-23	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-19 Agree
PX 24*	81-24	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-20 Agree

PX 25*	81-25	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	169-21 appears to be a filing error as it is not PX25
PX 26*	81-26	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-22 Agree
PX 29*	81-28	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-23 Agree
PX 34*	81-29	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-24 Agree except Telegram under-redacted personal identifying information
PX 35*	81-30	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-15 Agree
PX 37*	81-32	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-26 Agree
PX 38*	81-33	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-27 Agree
PX 43	81-37	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 171-8 Agree
PX 50	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Telegram proposed redactions not located
PX 58*	81-49	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-28 Agree except Telegram under-redacted personal identifying information

PX 59	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Telegram proposed redactions not located
PX 61	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-15 Telegram under-redacted See SEC Dkt.
PX 69	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-16 Agree except Telegram under-redacted personal identifying information
PX 70	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-17 Agree except Telegram under-redacted personal identifying information
PX 71*	81-58	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-29 Agree
PX 74	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-18 Agree except Telegram under-redacted personal identifying information
PX 76	N/A	A	This documents has not been filed on the public docket. Defendants request this documents be filed under seal and placed on the public docket in redacted form.	Dkt. 171-19 Object to proposed redactions of Telegram The producing party has agreed that this document can be filed on the public docket with only the Bates-number redacted
PX 78*	81-62	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-30 Agree

PX 81*	81-65	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-31 Agree
PX 82*	81-66	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-32 Agree
PX 83*	81-67	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-33 Agree
PX 84*	81-68	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-34 Agree
PX 85*	81-69	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-35 Agree
PX 86*	81-70	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-36 Agree
PX 87*	81-71	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-37 Agree
PX 89*	81-73	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-38 Agree
PX 94	N/A	A	This document has not been filed on the public docket. Defendants request this document only be filed on the public docket in redacted form and for the Court's copy to be filed under seal.	Dkt. 171-20 Agree
PX 97*	81-79	A	Defendants request this document be filed under seal and remain on the public docket with appropriate	Dkt. 169-40 Object to proposed redactions of investor identifying information;

			redactions.	Investor engaged in marketing and sales of Grams
PX 98*	81-80	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-41 Object to proposed redactions of investor identifying information; Investor engaged in marketing and sales of Grams
PX 99*	81-81	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-42 Agreed
PX 101	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-21 Agree except Telegram under-redacted personal identifying information
PX 102	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-22 Agree except Telegram under-redacted personal identifying information
PX 105	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-23 Agree
PX 106*	81-83	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-43 Agree
PX 109	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171 - 24 Agree except Telegram under-redacted personal identifying information
PX 110*	81-86	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-144 Agree

PX 111	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-25 Agree
PX 117	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171 – 26 Agree except Telegram under-redacted personal identifying information
PX 121*	81-94	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-45 Agree
PX 126	81-98 Refiled 122-98	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Telegram proposed redactions not located See SEC's proposed redactions in corresponding docket entry
PX 132*	81-104	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-46 Agreed
PX 134*	81-106	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-47 Agreed
PX 135*	81-107	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-48 Agreed

PX 137*	81-108	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-49 Agreed
PX 142*	97-4	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 171-9 Agree
PX 145	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-28 Agree
PX 146	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	The SEC will file this document under seal and a redacted version on the public docket.
PX 147	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties filed in connection with this document to determine appropriate redactions.	Dkt. 171-29 Agree except Telegram under-redacted personal identifying information
PX 149*	97-7	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-50 Agree
PX 150	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties filed in connection with this document to determine appropriate redactions.	Dkt. 171-30 Agree

PX 151	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 170-31 Agree
PX 152	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-32 Agree except Telegram under-redacted personal identifying information
PX 153*	97-8	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-51 Agree
PX 160*	97-15	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-52 Agree
PX 161*	97-16	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-53 Agree
PX 162*	97-17	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-54 Agree
PX 169	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-33 Agree
PX 180*	97-34	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-55 Agree
PX 194	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form. Defendants defer to the requests of the third parties	Dkt. 171-34 Object –See Objection to Dkt. 194 under Investor Z in Investor Chart

			filed in connection with this document to determine appropriate redactions.	
PX 195	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	Dkt. 171-35 Agree
PX 196	N/A	A	This document has not been filed on the public docket. Defendants request this document be filed under seal and placed on the public docket in redacted form.	170 - Filed publicly with redactions. Agree
PX 199*	97-49	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-56 Agree
PX 200*	97-50	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-57 Agree
Declaration of Kevin McGrath in Support of Plaintiff's Motion to Strike*	83	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166 Agree
Exhibits A to the McGrath Declaration	83-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166-1, Ex. A Agree
Exhibits G to the McGrath Declaration	83-7	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166-2 Telegram under-redacted; Agree to Investor G's proposed redactions at Dkt. 160-2, Ex. 8-B referenced in Investor Chart
Exhibits L to the McGrath Declaration	83-12	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166-3 Agree

Exhibits M to the McGrath Declaration	83-13	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166-4 Agree
Exhibits N to the McGrath Declaration	83-14	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 166-5 Agree except Telegram under-redacted personal identifying information
Declaration of Ladan Stewart in Support of Plaintiff's Motion for Summary Judgment*	81	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-1 Agree
Declaration of Ladan Stewart in Opposition to Defendants' Motion for Summary Judgment*	97	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 169-2 Agree
Drylewski Declaration in Support of Defendants' Motion for Summary Judgment and in Opposition to Plaintiff's Application for a Preliminary Injunction	73	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 171-1 Agree
Exhibit 2 to the Drylewski Declaration	73-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-1 Object to all proposed redactions except at 287-line 3 on ground not investor identification information and not otherwise proprietary or confidential information
Exhibit 4 to the Drylewski Declaration	73-4	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-2 Responses to SEC's First Interrogatories Object to the proposed redactions beyond personal identifying information of investors and prospective investors

Exhibit 5 to the Drylewski Declaration	73-5	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-3 Object to the proposed redactions of names of individuals and entities involved in marketing and selling Gram interests
Exhibit 7 to the Drylewski Declaration	73-7	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-4 Agree
Exhibit 8 to the Drylewski Declaration	73-8	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 171-2 Agree
Exhibit 10 to the Drylewski Declaration	73-10	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-5 Object to the proposed redactions of names of individuals and entities involved in marketing and selling Gram interests
Exhibit 12 to the Drylewski Declaration	73-12	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 171-3 Agree except Telegram under-redacted personal identifying information
Exhibit 13 to the Drylewski Declaration	73-13	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 165-6 Agree
Exhibit 1 to the McKeon Declaration in Support of Defendants' Motion for Summary Judgment and in Opposition to Plaintiff's Application for a Preliminary Injunction	74-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Telegram's proposed redactions not located
Malloy Declaration in Opposition to Plaintiff's Motion for Summary Judgment	94	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167 Agree; investor identifying information only

Exhibit 1 to the Malloy Declaration	94-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-1 Excerpts from Pavel Durov Deposition Object to redactions of names of investors and entities that were involved in marketing and reselling Gram interests; their identities and roles are highly relevant to judicial determination whether Telegram qualifies for an exemption from registration; Agree to redaction of name of investor at p. 185, line 16-17
Exhibit 2 to the Malloy Declaration	94-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-2 Excerpts from Ilya Perekopsky Deposition Object to redactions of names of investors and entities that were involved in marketing and reselling Gram interests; their identities and roles are highly relevant to judicial determination whether Telegram qualifies for an exemption from registration; Object to redactions of names of vendors contacted re use of Grams; Telegram's efforts and efforts of others to develop the TON blockchain are highly relevant to issues before the Court
Exhibit 3 to the Malloy Declaration	94-3	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-3 Excerpts from Shyam Parekh Deposition Object ; proposed redactions relate to individuals and entities that were involved in marketing and reselling Gram interests; their identities and roles are highly relevant to judicial

				determination whether Telegram qualifies for an exemption from registration;
Exhibit 4 to the Malloy Declaration	94-4	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-4 Object ; Telegram seeks to redact references to how they spent the money raised in the Offering; Telegram's efforts to develop the Ton Blockchain are highly relevant to <i>Howey</i> test
Exhibit 5 to the Malloy Declaration	94-5	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Telegram's proposed redactions not located
Exhibit 6 to the Malloy Declaration	94-6	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-5; Email Agree Redacting investor identification information only
Exhibit 7 to the Malloy Declaration	94-7	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-6 Chat Agree Redacting investor identification information only
Exhibit 8 to the Malloy Declaration	94-8	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-7 Email chain Object to redacting name of non-investor entity who was involved in marketing and reselling Gram interests
Exhibit 9 to the Malloy Declaration	94-9	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-8 Object to redaction of entity's name. Telegram letter to purchaser re information it was reselling Gram interests; entity was not a passive purchaser and its actions are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration

Exhibit 10 to the Malloy Declaration	94-10	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-8 Object to redaction of entity's name. Telegram letter to purchaser re information it was reselling Gram interests; entity was not a passive purchaser and its actions are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration
Exhibit 11 to the Malloy Declaration	94-11	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-10 Telegram invoice paying entity for services in marketing and selling grams to additional investors. Object to redaction of entity's name; entity was not a passive purchaser and its actions are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration; Agree to proposed redactions of names of investors that entity assisted Telegram in enlisting
Exhibit 14 to the Malloy Declaration	94-14	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-11 Agreement between Telegram and entity to "broker the sale of a new cryptocurrency called "Grams" to potential investors identified by Company;" Object to redaction of entity's name; entity not a passive investor; entity's role in assisting Telegram in its offer and sale of Grams are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration;

Exhibit 15 to the Malloy Declaration	94-15	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 167-12 Telegram email chain with its auditor and an investor; Object to redacting name of auditor, no basis for redaction; Agree to redact name of investor.
Exhibit 1 to the Musoff Declaration	121-1	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-1 Excerpts from Pavel Durov Deposition Object to redaction of each of the referenced entity's names; entities not passive investors; the entities roles in assisting Telegram in its offer and sale of Grams are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration;
Exhibit 2 to the Musoff Declaration	121-2	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-2 Email chain Agree; redacting investor identifying information only
Exhibit 3 to the Musoff Declaration	121-3	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-3 Messenger Chat Agree; redacting investor identifying information only
Exhibit 5 to the Musoff Declaration	121-5	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-4 Email from investor entity to Telegram re payment for services rendered to Telegram in obtaining new investors in Offering; entity not a passive investor; entity's role in assisting Telegram in its offer and sale of Grams are relevant to issues before the Court re <i>Howey</i> test and claimed exemptions from registration;
Exhibit 6 to the Musoff Declaration	121-6	A	Defendants request this document be filed under seal and remain on the public docket with appropriate redactions.	Dkt. 168-5 Messenger Chat Agree Redacting investor identifying information only

Category B - Highly Confidential Business and Proprietary Information				
Exhibit E to PX 2	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document.	Investor B investment memo Object except agree to redact investor information See objections to sealing PX2-E set forth in Investor Chart under Investor B –
Exhibit A to PX 5	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document to determine appropriate redactions.	Investor E email containing investment analysis – Object except agree to redact investor information See objections to sealing PX5-A set forth in Investor Chart under Investor E–
Exhibit B to PX 5	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document to determine appropriate redactions.	Investor E email containing investment analysis – Object except agree to redact investor information See objections to sealing PX5-B set forth in Investor Chart under Investor E –
Exhibit A to PX 7	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document.	Investor G email containing investment analysis – Object except agree to redact investor information See objections to sealing PX7-A set forth in Investor Chart under Investor G–
Exhibit A to PX 8	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document.	Investor H memo containing investment analysis – Object except agree to redact investor information See objections to sealing PX8-A set forth in Investor Chart under Investor H–
PX 28	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this	Investor E emails with Telegram – Object except agree to redact investor information See objections to sealing PX28 set forth in Investor Chart under Investor E –

			document to determine appropriate redactions.	
PX 30	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal in its entirety.	Dkt. 164-1 Object to any redaction except investor identification information; Document is third party's investment analysis; third party has not moved to seal; Telegram has no standing to move to seal; substantial portion of memo is summary of Telegram offering; rest of memo does not contain unique confidential or proprietary information in any event
PX 31	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document.	Investor F investment memo Object except agree to redact investor information See objections to sealing PX31 set forth in Investor Chart under Investor F –
PX 32	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal in its entirety.	Dkt. 164-2; Investor X Investment Memo discussed in Investor Chart; Object on grounds not Telegram's document and on same grounds set forth in Investor Chart; Memo contains summary of Telegram Offering, comparison to other blockchains and crypto-assets and analysis of investment opportunity but does not reveal unique, proprietary investment strategies or analysis except we do not object to redacting one paragraph discussing investment allocation; the investor's due diligence checklist; agree to redacting investor identifying information

PX 33	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal in its entirety.	Dkt. 164-3; not a Telegram document; Investor Investment memo; Investor was given notice that SEC planned to disclose document, with only investor identifying information redacted, and did not object to disclosure; memo contains extensive summary of Telegram offering and investment analysis that does not rise to level of proprietary information or trade secret; Agree to redact investor identifying information only
PX 55	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and filed on the public docket in redacted form.	Dkt. 171-14; email chain between Telegram employee and binance employee; Object to proposed redaction; Telegram seeks to redact suggestion from third party re potential future business idea on ground release of future business plans could hurt business, but Telegram's future business plans are directly relevant to key issues to be decided by Court including whether Telegram will continue to engage in efforts to support and develop the TON Blockchain and this business idea is not likely to harm Telegram's competitive standing
PX 77	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal in its entirety.	Dkt. 164-4; not a Telegram document; Object to sealing; agree to redact references to investors contained in memo; document is a third party investment memo created by entity involved in marketing and reselling grams and sent to prospective investors as marketing material; memo contains extensive summary of Telegram offering and

				investment analysis that does not rise to level of proprietary information or trade secret
PX 123	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and filed on the public docket in redacted form.	Dkt. 171-27; email chain between Telegram and investor; Telegram seeks to redact investor internal email summarizing information from Telegram regarding past and anticipated expenditures including on TON blockchain on ground release of future business plans could hurt business, but Telegram's future business plans are directly relevant to key issues to be decided by Court including whether Telegram will continue to engage in efforts to support and develop the TON Blockchain and this business idea is not likely to harm Telegram's competitive standing; Agree to redact investor identifying information
PX 148	N/A	B	This document has not been filed on the public docket. Defendants request this document be filed under seal and defer to the sealing requests of third parties filed in connection with this document.	The SEC will file the document under seal and in redacted form on the public docket
Defendants' Response to Plaintiff's 56.1 Statement	95	B	To the extent the Court grants Defendants' requests to seal, Defendants request this document be filed under seal and be placed on the public docket with redactions conforming to any related documents.	Object to redaction from this document of any information whose redaction in other documents the SEC has objected to

Defendants' Response to Plaintiff's 56.1 Counter-Statement of Undisputed Material Facts in Further Support of its Motion for Summary Judgment	120	B	To the extent the Court grants Defendants' requests to seal, Defendants request this document be filed under seal and be placed on the public docket with redactions conforming to any related documents.	Object to redaction from this document of any information whose redaction in other documents the SEC has objected to
Category C - Banking Records				
PX 90*	81-74	C	Defendants request this document be filed under seal and remain on the public docket in redacted form.	Dkt. 169-39; Bank Account Statement Agree to redactions
PX 115	N/A	C	Defendants request this document be filed under seal in its entirety.	Dkt. 164-5 –two page wire transfer Object to sealing entire document, which contains evidence of payment by Telegram to entity involved in marketing and reselling gram interests; Agree to redacting confidential banking information
PX 136	N/A	C	Defendants request this document be filed under seal in its entirety.	Dkt. 164-6 – Telegram bank account statement; Agree to sealing document on condition that relevant payment information (but excluding account information) from document may be publically cited in parties' filings and discussed in open court proceedings